

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION
NO: 4:19-CR-9-1FL**

UNITED STATES OF AMERICA

v.

MAURICE MONTRELL GREENE,

Defendant

**DEFENDANT'S MOTION TO
CONTINUE ARRAIGNMENT
and MOTION FOR EXTENSION
of TIME TO FILE
PRETRIAL MOTIONS**

COMES NOW, Defendant, Maurice Montrell Greene, by and through his undersigned counsel of record, and hereby moves for an extension of time of thirty (30) days to file pre-trial motions, including motions to compel discovery, motions to suppress and motions under Rules 7, 8, 12, 13, 14, 16 and 41 of the Federal Rules of Criminal Procedure, and to continue the arraignment in this matter to a later term of Court. In support of said Motion, Defendant shows unto the Court as follows:

1. Defendant is charged in a 6 count Indictment in which he is alleged to have conspired to distribute and possess with the intent to distribute cocaine.
2. An Order addressing pre-trial scheduling was entered by the United States District Judge Louise Flanagan. Within said Order, April 25, 2019 was set as the last day to file all pre-trial motions.

3. The undersigned has recently received discovery in this matter. Accordingly, the undersigned requires additional time in which to receive and review the discovery in this matter.

4. That furthermore, counsel for Defendant requires additional time in which to meet with the Defendant and determine the necessary pretrial motions, if any, in this matter.

5. Given the status of Counsel for Defendant's review of discovery, and the ongoing nature of good faith discussions between defense counsel and the government and communicating the same with Defendant, the undersigned respectfully seeks the above requested extension of the pretrial motions deadline and a corresponding continuance of the arraignment.

6. Counsel for the government, Dena King, Assistant United States Attorney, has been contacted concerning his position as to this motion and does not object to the same.

7. The undersigned Counsel respectfully submits the allowance of this motion would serve the ends of justice and such allowance would also outweigh the best interest of the public and the Defendant in a speedy trial.

WHEREFORE, the Defendant, by and through his undersigned counsel of record, hereby moves that the Defendant be allowed an additional thirty (30) days within which to file pre-trial motions and to continue the arraignment to a later term of Court.

Respectfully submitted this the 25th day of April, 2019.

GREENE & WILSON, P.A.

/s/ Thomas R. Wilson
THOMAS R. WILSON
P.O. Box 1676
New Bern, NC 28563
t: (252)634-9400
f: (252)634-3464
twilson@greenewilson.com
N.C. State Bar No.: 31876
CJA Panel - Appointed

CERTIFICATE OF SERVICE

I hereby certify that I this day have served a copy of this pleading upon the other parties to this action electronically as indicated to counsel for said parties, this 25th day of April, 2019.

Dena King, AUSA (via CM/ECF)

GREENE & WILSON, P.A.

/s/ Thomas R. Wilson
THOMAS R. WILSON
P.O. Box 1676
New Bern, NC 28563
t: (252)634-9400
f: (252)634-3464
twilson@greenewilson.com
N.C. State Bar No.: 31876
CJA Panel - Appointed